

# **ALABAMA AIR UPDATE**

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# Tightened Air Quality Standards for Ozone and PM-Fine

- Significant change for PM-Fine expected
  - If changed from 12  $\mu\text{g}/\text{m}^3$  to 10, no effect on AL.
  - 9 or below, 2 or more non-attainment areas in AL

# Ozone

- EPA recently changed course, may lower
  - If changed from 70 ppb to 60 or lower, several non-attainment areas in AL
- Possibility of complex, strict secondary standard

# Interstate Transport of Ozone Precursors

- Federal rules demand that 20+ states reduce utility and heavy industry NO<sub>x</sub> emissions
- Actions violate federal/state partnership principles
- Alabama and  $\approx$  10 other states suing EPA

# Start-up, Shutdown and Malfunction Rule plus Periodic Regional Haze Plan

- ADEM has not submitted anything to EPA for approval
- Awaiting clear path for approval

# Permitting

- Increased activity by NGO's on Major Source Operating Permits (Title 5's) and PSD Construction Permits
- EJ, Cumulative Impacts, Degree of detail in permits
- Civil Rights complaints, petitions

# CO<sub>2</sub> from Power Plants

- EPA recently proposed a third attempt at rules for CO<sub>2</sub> from existing and new fossil fuel plants
- Finds that sequestration and hydrogen firing are proven technologies

# Three Most Misunderstood Concepts in Environmental Regulation

1. Civics
2. Averaging time
3. Enforcement



# Open Valve

- After a shutdown, by-pass valve left open for 150 days at a chemical plant
- Organic vapors not sent to incinerator
- Facility reported problem and corrected it as soon as discovered

# Stack Test Not Completed

- Test scheduled by facility every 5 years
- Test done by continuous sampler
- Results during calibration period off-scale
- Facility postpones test

# Stone Crusher without Filtration

- Crusher processes dusty rock into fine particles
- Has a hood and a fabric filter to control dust
- Fan on ventilation system out for two weeks
- Permit says use ventilation whenever process in operation
- Facility says it processed only wet material during outage

# Inaccurate Stack Test Calculations

- Facility does annual stack test
- Reports failure 4 months later with no corrective action
- Permit says report results within 30 days of test plus report failures as soon as discovered
- ADEM's review shows test passed